

Message

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Sent: 2/24/2015 6:09:22 PM
To: Allen, HarryL [Allen.HarryL@epa.gov]
Subject: Advice re QAPP for field screening for unexpected conditions?
Attachments: H_Draft Final RMP Appendix H_013015 (redline).docx

Hi Harry,

Ex. 5 Deliberative Process (DP)

For reference, below is an excerpt of what the draft Risk Management Plan already includes. Attached is the full appendix.

Following the notification of the initial discovery and upon concurrence from the SFDPH and the FFA Signatories, the Owner will proceed with further assessment of a Category 2 Condition until the condition can be classified as a hazardous substance condition, petroleum substance condition, or a co-mingled condition. The assessment procedures are documented in Flowchart H-1, Boxes 2, 2A, and 2B. Assessment work shall be conducted by a competent and Registered Professional.

The assessment may include the use of one or more field screening instruments: organic vapor monitor (OVM), photoionization detector (PID) x-ray fluorescence (XRF), gamma ray spectrometer, etc., physical observation (visual and olfactory characteristics), and sampling and chemical testing of the exposed affected media (soil, soil gas, groundwater, sediment, etc.). The assessment of the Condition may also include excavation and segregation of soil that contains visual or olfactory evidence of contamination to provide an indication of the magnitude and geographic extent of the Condition. In the event that some amount of excavation will occur, the Owner will follow the soil management protocol specified in the RMP (Section 5.3). Field documentation will be generated that describes the location and type of the affected media, describes samples collected (number, location, type), conveys results of any field screening (OVM, PID, XRF, etc.) results, provides volume estimates of excavated/stockpiled material, and describes stockpile control measures.

The assessment will follow the protocol specified in the most current version of the Navy's Quality Assurance Project Plan, as applicable. A minimum of one investigation sample and corresponding quality control (QC) samples (duplicate, travel blank, equipment blank, etc.) will be collected for each media (liquid in object, soil, sediment, soil vapor, or groundwater) that is suspected to be impacted. In addition to primary samples, duplicate samples and other applicable QC samples will be collected and submitted for analysis. The samples will be collected in accordance with industry standard protocols and collection procedures as identified by the competent and licensed professional overseeing the work. As an initial screen, collected samples may be analyzed for the following constituents:

- Volatile organic compounds (VOCs), including fuel oxygenates by EPA Test Method 8260B or approved equivalent;
- Semi-volatile organic compounds (SVOCs), including polycyclic aromatic hydrocarbons (PAHs) by EPA Test Method 8270C or approved equivalent;
- CAM 17 Metals by EPA Test Method 6010B/7400 or approved equivalent;
- Pesticides by EPA Test Method 608 or EPA Test Method 8081A or approved equivalent;
- Polychlorinated biphenyls (PCBs) by EPA Test Method 608 or EPA Test Method 8082 or approved equivalent;
- TPH-gasoline range organics (TPH-gasoline) by EPA Test Method 8015B or approved equivalent;
- TPH-diesel range organics (TPH-diesel) by EPA Test Method 8015B or approved equivalent;
- TPH-motor oil range organics (TPH-motor oil) by EPA Test Method 8015B or approved equivalent; and
- Radionuclides radium-226 and cesium-137.

Analyses will be selected to correspond with the suspected constituents of potential concern (COPCs) at the location being assessed. Conditions that will be considered in selecting the analysis include previous work conducted by the Navy at the location, known conditions as documented in Navy reports for the location, history of hazardous substance and/or petroleum use at the location as documented by the Navy, field observations, and other anecdotal information. The results of the initial sampling will be compared to the Petroleum Program Strategy Preliminary Screening Criteria (PSC) and/or applicable Record of Decision (ROD) remediation goals. In the event that a constituent is detected that is not listed in the Petroleum Program Strategy PSC and/or applicable ROD remediation goals, the most recent version of the EPA's Regional Screening Levels (RSLs) will be used. Evaluation of the analytical results will allow the Owner to make an initial determination whether the Condition is:

1. A Condition that does not require further response or regulatory oversight; or,
2. A petroleum Condition that requires further evaluation and response; or,
3. A hazardous substance/comingled Condition that requires further evaluation and response.

Based on the evaluation of the results of the chemical testing, the Owner will then inform the SFDPH and the FFA Signatories of its findings, conclusions, and recommendations (See Flowchart H-1, Boxes 2B and 3).

Lily Lee
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